

SOUTHERN ENVIRONMENTAL LAW CENTER

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August 9, 2019

VIA ELECTRONIC FILING

Hon. Jocelyn Boyd, Chief Clerk
SC Public Service Commission
Post Office Drawer 11649
Columbia SC 29211

Re: Dockets 2019-184-E, 2019-185-E, 2019-186-E
Proposed Questions for Potential Independent Experts

Dear Ms. Boyd:

On behalf of the Southern Alliance for Clean Energy (“SACE”) and the South Carolina Coastal Conservation League (“CCL”) and in response to Order No. 2019-557 issued by the Public Service Commission of South Carolina (“Commission”) in the above-referenced docket, SACE and CCL submit the following questions to the Commission for its consideration as it conducts interviews of potential third-party consultants and experts.

- 1) What is your experience with public service commissions? For example, have you served as a public service commissioner, advised commissions, and/or testified before commissions?
- 2) How much of your career has been spent as a party-neutral advisor to public utility commissions or other decision-makers?
- 3) In serving on a public service commission, advising commissions, or testifying before them, have you worked on avoided cost proceedings? If so, please provide more information regarding the level of your involvement and analysis.
- 4) What is your experience with evaluating and calculating avoided energy costs, avoided capacity costs, and related values?
- 5) Beyond public service commission related work, what has been your involvement in avoided cost issues during your career?
- 6) Have you worked for the federal government or state government? If so, did that work encompass avoided cost issues pursuant to the Public Utility Regulatory Policies Act (“PURPA”) or relevant state law? What was your level of involvement?

- 7) How much of your career has been focused on consumer or public interests, rather than the monetary interests of individual businesses or industries?
- 8) Through the Energy Freedom Act (Act 62), the South Carolina General Assembly affirmed “the state’s policy of encouraging renewable energy.” How will you incorporate this directive into your analysis and recommendations made to the Commission?
- 9) Federal law provides states with a fair amount of discretion in the interpretation of the PURPA. The recently passed South Carolina Energy Freedom Act provides additional direction to the Commission, but also still leaves some discretion to the Commission on PURPA avoided cost related issues in this proceeding. Do you believe that your role will be primarily to advise the Commission on whether the filing conforms to prior Commission decisions, or will you be providing the Commission with your best professional opinion on the filings within the bounds of state and federal law?

Thank you for allowing the parties to submit proposed questions and your consideration of this matter. If you have any questions or need additional information, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in black ink, appearing to read "J. Blanding Holman IV", followed by a horizontal line.

J. Blanding Holman IV
Southern Environmental Law Center